BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Amendments to   Docket No. RM2020-7
Rules of Practice

PUBLIC REPRESENTATIVE SECOND MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(April 24, 2020)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public

Representative requests in this Second Motion that an Information Request be issued to

obtain additional clarifying data and information from the Postal Service concerning a

methodology to update city carrier cost attribution to account for recent volume trends,

labeled as Proposal Two.[1]

The Public Representative proposes the following questions for the Postal

Service.

For questions 1 through 3, please refer to USPS-RM2020-7-1 - Public

Material Relating to Proposal Two,

Prop.2.Carrier.Update.Fldr.1.Preface.Rev.4.14.20.pdf, Revised April 14, 2020 (LR

Preface), which states that "updated city carrier unit flats delivery costs are calculated in

three steps." First, updated variabilities are inserted into CS06&7-Public-FY19.xlsx

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[1] Petition of the United States Postal Service for the Initiation of a Proceeding to Consider
Proposed Changes in Analytical Principles (Proposal Two), April 7, 2020. (Petition).

(CS06&7). Second, UDCInputs19.New.v2.xlsx, reads in the updated volume variable cost from the modified CS06&7, and then calculates the volume variable costs by shape. Lastly, separate unit flats costs for FSS and non-FSS zones are calculated in FSSDeliveryModel19.xlsx (FSS Delivery Model), by reading "in updated costs by shape from UDCInputs19.New.v2.xlsx." (LR Preface at 2-3.)

1.   Please identify the cell(s) in FSS Delivery Model which are used as inputs, or are linked to, in order to construct files the Postal Service submits as part of its Annual Compliance Review (ACR) Report, or a general rate case filing for market dominant products (other than the FSS Delivery Model file).

2.   If there are files which rely upon values or links to the FSS Delivery Model, please identify the Docket No., Library Reference(s), Files, Sheets and Cells in which cells in these files are linked or take their value from FSSDeliveryModel*FY*.xlsx. (*FY* stands for any fiscal year between FY 2016 to FY 2019.)

3.   If cells from cells from FSSDeliveryModel*FY*.xlsx are not input or linked to cells used in ACRs or rate cases, please identify dockets, other than the instant docket, where they have played this role. In your answer, please identify the Docket No., the Library Reference(s), Files, Sheets and Cells in which cell values or links from FSSDeliveryModel*FY*.xlsx appear.

4.   Please refer to the Bradley Report, Table 1 at 2 and Revised LR, FSS Delivery. Please identify the cells from the FSS Delivery Model in this docket which are entered into or referenced by USPS-RM2020-7-NP1 - Nonpublic Material Relating to Proposal Two, Calculate Unit Carrier Cost with New Variabilities.xlsx.

5.   Please update the unit street delivery costs shown in Table 1 with City Carrier Street Unit street delivery costs shown in Revised LR, FSS Delivery, Tab: "Summary," Cells, L12:L15, and L20:L23.

6.   Please confirm that the Mail Classification Schedule, January 26, 2020 (Revised Through March 31, 2020) does not contain any products categorized according

to whether they destinate in an FSS or non-FSS Zone. If you do not confirm, please explain.

Respectfully Submitted,

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